REMARKS

Claims 1 and 3-61 remain pending in the application.

Claims 1, 3-10, 15 and 17-61 over Gleeson in view of Dunlop

In the Office Action, claims 1, 3-10, 15 and 17-47 were rejected under 35 U.S.C. §102(b) as allegedly being obvious over U.S. Patent No. 5,446,736 to Gleeson et al. ("Gleeson") in view of U.S. Patent No. 6,721,872 to Dunlop et al. ("Dunlop"). The Applicants respectfully traverse the rejection.

Claims 1, 3-10, 15 and 17-61 are amended herein to recite a system and method that rely on a protocol gateway that is adaptively arranged between at least two of a plurality of networks to encapsulate a fundamental network protocol.

The Examiner acknowledged that Gleeson fails to disclose "a protocol gateway to encapsulate a fundamental network protocol." (see Office Action, page 4). However, the Examiner relies on a Dunlop to allegedly make up for the acknowledged deficiencies in Gleeson to arrive at the claimed features. The Applicants respectfully disagree.

Dunlop's invention appears to disclose a multi-protocol reconfigurable network interface card or NIC 20 (see Fig. 2). The NIC 20 can support multiple network operating protocols between a chosen network 16 and a host device 18 (see Dunlop, col. 3, lines 20-22; Fig. 2).

Dunlop discloses a network interface card or NIC. As Dunlop shows in Fig. 2 the NIC 20 is used as an interface between a host 18 and a network 16. Thus, Dunlop's NIC that provides an interface between a host and a network is not a protocol gateway that is adaptively arranged between at least two of a plurality of networks, much less a protocol gateway that is adaptively arranged between at least two of a plurality of networks to encapsulate a fundamental network protocol, as recited by claims 1, 3-10, 15 and 17-61.

Thus, Gleeson in view of Dunlop fails to disclose, teach or suggest a protocol gateway that is adaptively arranged between at least two of a plurality of networks, much less such arrangement to encapsulate a fundamental network protocol, as recited by claims 1, 3-10, 15 and 17-61.

Accordingly, for at least all the above reasons, claims 1, 3-10, 15 and 17-61 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 11-14 and 16 over Gleeson in view of Dunlop and Meyer

In the Office Action, claims 11-14 and 16 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gleeson in view of Dunlop, and further in view of U.S. Patent No. 6,778,099 to Meyer et al. ("Meyer"). The Applicants respectfully traverse the rejection.

Claims 11-14 and 16 recite a system and method that rely on a protocol gateway that is adaptively arranged between at least two of a plurality of networks to encapsulate a fundamental network protocol.

As discussed above, the Gleeson in view of Dunlop fails to disclose, teach or suggest a system and method that rely on a protocol gateway that is adaptively arranged between at least two of a plurality of networks, much less a protocol gateway that is adaptively arranged between at least two of a plurality of networks to encapsulate a fundamental network protocol, as recited by claims 11-14 and 16.

The Examiner relies on Meyers to allegedly make up for the deficiencies in Gleeson to arrive at the claimed features. The Applicants respectfully disagree.

Meyer discloses a communications module that permits remote meter reading of a utility meter. However, Meyer's fails to teach any device that is arranged between at least two of a plurality of networks, much less such an arrangement to encapsulate a fundamental network protocol. Meyer fails to disclose, teach or suggest a system and method that rely on a protocol gateway that is adaptively arranged between at least two of a plurality of networks to encapsulate a fundamental network protocol, as recited by claims 11-14 and 16.

Thus, theoretically modifying Gleeson with Dunlop and Meyer, would still fail to disclose, teach or suggest a system and method that rely on a protocol gateway that is adaptively arranged between at least two of a plurality of

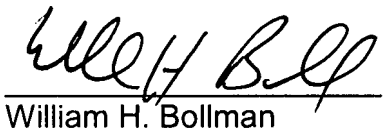
networks to encapsulate a fundamental network protocol, as recited by claims 11-14 and 16.

Accordingly, for at least all the above reasons, claims 11-14 and 16 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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